

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

V.

JEREMIAH MARTEZ SUTTON,

Defendant.

No. 4:24 MJ 7038 SPM

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Angie E. Danis, Assistant United States Attorneys for said District, and move this Court to order the defendant detained pending trial, and further requests that a detention hearing be held at the time defendant's initial appearance before the United States Magistrate Judge pursuant to Title 18, United States Code, Section 3141, et. seq., and per current guidance from the Court.

As for its grounds for detention, the government requests this Court to consider the following factors pursuant to Title 18, United States Code, Section 3142.

Presumption of Detention

1. The defendant is charged with offenses for which the presumption of detention applies in this matter.

The Nature and Circumstances of the Offense

2. Title 18, United States Code, Section 3142(g) requires this Court to consider the nature and characteristics of the offense charged, including whether the offense is a controlled substance offense or a crime of violence. The instant offense involves not only a conspiracy to

distribute controlled substances, but the discharge of one or more firearms in furtherance thereof which resulted in the death of victim J.R. and serious physical injury to victim M.H.

The Weight of the Evidence Against the Defendant

3. Section 3142(g)(2) requires this Court to consider the weight of the evidence against the defendant. The government submits that the evidence against the defendant is strong and relies on the facts as articulated in the Complaint Affidavit in reliance on same.

The History and Characteristics of the Defendant

4. The defendant does not have any criminal history that is known to the Government at this time.

The Nature and Seriousness of the Danger to the Community

5. The defendant engaged in the commission of a drug-related homicide and fled after the commission thereof. It is difficult to imagine a greater danger to the community than one engaged in violence directly tied to narcotics offenses.

Risk of Flight

6. There a serious risk that the defendant will flee because she is facing a significant sentence in this case, based on the severity of the charges.

Conclusion

7. The government submits that when considering all of the factors outlined in Title 18, United States Code, § 3142(g), the factors weigh heavily in favor of detention. There is clear and convincing evidence that no condition or combination of conditions that will reasonably assure

the safety of any other person and the community as well as the appearance of the defendant.

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

/s/ Angie E. Danis
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Assistant United States Attorney